

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF
INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO BANK (IRELAND), LTD, (f/k/a
FORTIS PRIME FUND SOLUTIONS BANK
(IRELAND) LIMITED) and

ABN AMRO CUSTODIAL SERVICES (IRELAND),
LTD (f/k/a FORTIS PRIME FUND SOLUTIONS
CUSTODIAL SERVICES (IRELAND) LTD.),

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05355 (SMB)

**[PROPOSED] ORDER ON MOTION OF DEFENDANT ABN AMRO BANK
(IRELAND), LTD. AND ABN AMRO CUSTODIAL SERVICES (IRELAND), LTD.
TO FILE UNDER SEAL PORTIONS OF THEIR MEMORANDUM OF LAW IN
OPPOSITION TO TRUSTEE'S MOTION FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT AND ACCOMPANYING DECLARATION AND
EXHIBITS**

Upon the motion (the “Motion”)¹ of Defendants ABN AMRO Bank (Ireland), Ltd. and ABN AMRO Custodial Services (Ireland), Ltd. (together, “Defendants”) for entry of an order (this “Order”) authorizing Defendants to file under seal portions of Defendants’ Memorandum of Law in Opposition to Trustee’s Motion for Leave to File an Amended Complaint and the Declaration of Thomas J. Giblin, dated April 23, 2019, in Opposition to Trustee’s Motion for Leave to File an Amended Complaint with Exhibits A-I, and to file redacted versions of the Confidential Documents; and the Court having reviewed the Confidential Documents and determined that the Confidential Documents should be filed under seal; and upon all the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Defendants are authorized to file the Confidential Documents under seal.
3. Defendants are authorized to file the Opposition and Declaration in redacted form on the public dockets, reflecting redactions that exclude information drawn from the Confidential Exhibits. The Confidential Exhibits will remain under seal and be withheld in full.
4. At the conclusion of this case, the Defendants shall dispose of any unredacted copies of the Confidential Documents that are the subject of the Motion.

¹ Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Motion.

5. This Order is without prejudice to the rights of any party-in-interest or the United States Trustee to seek to make public any of the redacted portions of the Confidential Documents.
6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2019
New York, New York

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE